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*Excel Corporation*

1120 NORTH MAIN • ELKHART, INDIANA • 46514

AREA CODE 219 264-2131

November 16, 1982

Mr. Ralph C. Pickard
Technical Secretary
Environment Management Board
State of Indiana
1330 W. Michigan Street
Indianapolis, IN 46206

Dear Mr. Pickard:

This is in response to the points raised on page 2 of your letter of October 6, 1982. Our answers are based on the information we have been able to obtain so far. The fact that manufacturing operations were discontinued nearly two years ago adds understandable difficulty and time to the task of locating information and records.

Point 1: Trichloroethylene was used at the Excel Corporation facility from about 1945 until January 1981 when manufacturing operations were discontinued. Excel Corporation has records dating back to June 1975 which show that, during the six months ended December 31, 1975, 3071 gallons were purchased; during 1976, purchases totaled 9759 gallons; during 1977, 11527 gallons; during 1978, 2466 gallons and, during 1979, 2185 gallons. The last purchase was made on June 12, 1979. In addition, 486 gallons of 111-trichloroethane were purchased in 1975 and 55 gallons in 1978. We have no records of earlier purchases but, based on prior years' levels of business and discussions with the individuals responsible for the purchase of TCE since 1969, it can be reasonably estimated that the maximum amount bought in any year was 12,000 gallons and that significantly lesser amounts would have been purchased in most years prior to 1975. We have contacted the trichloroethylene vendors to determine if they have records of earlier purchases but have not yet received their answers.

Point 2: We have no knowledge of the use of trichloroethylene by manufacturers at, owners of, or other occupants of the site now occupied by Excel Corporation. The property where test wells 15 and 16 are located and where the three soil samples were taken in June 1982 belonged to the New York Central Railroad until September 1963 when Excel Corporation purchased and first

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occupied that property. A portion of that property, which is adjacent to wells 15 and 16, was leased from the railroad and from Excel Corporation until October 31, 1965, by the Shell Oil Company for a bulk storage and distribution facility for petroleum products. A second portion, now part of Durakool's property, was leased from the railroad and Excel Corporation until November 1964 by Yoder Oil Company also for a bulk petroleum storage and distribution facility. It is not known whether the railroad, Shell or Yoder transported, stored or used trichloroethylene on these premises.

Points 3 and 4: Trichloroethylene was used as a degreasing agent to clean metal parts prior to welding. It was normally purchased in 1000 gallon lots and pumped from a tanker truck to a storage tank located outside the Excel Corporation building. Test well 17, which is adjacent to the storage tank, shows only 26 ppb of TCE and it is our understanding that soil samples from that area contained no significant levels of TCE. Occasionally purchases of TCE were made in 55 gallon drums. The TCE was pumped from the storage tank or the drum to the degreasing tank. There it was heated to its boiling point allowing the TCE vapors to clean metal parts hanging in a basket above the degreaser. Some TCE vapor would condense and it, together with the oils and dirt from the parts, would drop back into the degreaser tank. Clean TCE was pumped into the degreasing tank to replace that lost through evaporation.

Supervisory personnel, who were responsible for maintenance of the degreaser since about 1960, advise that until 1971 the degreaser was cleaned from two to four times a year. Prior to cleaning, the level of material in the tank was allowed to run down to about 35-40 gallons and this residual TCE, oil and dirt mixture was pumped into barrels which were returned to the vendor for reclaiming the useable TCE. In January 1971, Excel Corporation bought a still which allowed in-house reclamation of the TCE. The sludge from the still contained a much lower concentration of TCE. This material, in amounts of approximately 25-30 gallons at a time, was pumped from the still into barrels and returned to the vendor. Since 1978, when enforcement of hazardous waste disposal procedures was first initiated by the State of Indiana, all TCE sludge has been disposed of pursuant to applicable regulations. Those disposals have been reported on the State of Indiana Stream Pollution Control Board forms SPC27. The amounts disposed of were 550 gallons in September 1978, 935 in June 1979, 385 in June 1980, and 220 in December 1980. While we have no records to that effect, there could have been occasions prior to 1978 when TCE sludge was hauled away by commercial refuse haulers rather than sent back to the vendor. It is also possible that, prior to about 1960, the maintenance man cleaning the degreasing tank could have disposed of TCE sludge by either sending it to a commercial dump or by dumping




it out on the building site. Again, there are no records to substantiate the handling of TCE or TCE waste products during that time. If this had been done, based on the amount of sludge generated and frequency of cleaning the degreasing tank from 1960 through 1971, the quantity of TCE dumped would have been in the range of 80-120 gallons per year and the frequency from two to four times annually. The most probable sites where trash would have been dumped were in areas which are now under buildings erected in 1955, 1963 and 1966. Prior to construction, the sites of these building additions were bulldozed clear of any trash and foreign materials and fill dirt was hauled in. It is highly unlikely that any barrels or other containers would have been left. Substantial fill was required under the south and west portions of the 1963 addition and all of the 1966 building. We have no way of knowing whether the fill dirt was contaminated.

In summary, from the information we have been able to obtain so far, it seems clear that no trichloroethylene was dumped on the premises since at least the early 1960's. If any had been dumped prior to that time, the amounts would have been minimal, the frequency less than four times a year, and the probable sites cleaned of trash, filled and now under buildings. The area where test wells 15 and 16 are located was not even owned by Excel Corporation until 1963 and prior to this was separated from the factory site by a railroad track making an inadvertent disposal there highly unlikely.

We are continuing to attempt to obtain more definite information concerning the use of trichloroethylene in the Excel Corporation plant and to obtain data from suppliers and disposers of this material.

Sincerely yours,


D. L. White
Vice President

DLW/mgh

Response to Request No. 12. Because of lack of specificity of the request, we are unable to fully respond, but none of the areas described in the Response to Request No. 11 have been sold.

Response to Request No. 13. No.

Response to Request No. 14. We have no records to substantiate any of the information requested in Request No. 14, but, prior to 1971, unknown quantities of TCE may have been dumped on the plant premises in unknown locations. We have no information to indicate that any containers or drums were ever so dumped or buried.

Response to Request No. 15. There is no record of any such spills.

Response to Request No. 16.

A. The storage tank was located adjacent to the south wall of the main manufacturing building; it was cylindrical in shape, constructed of steel, and mounted in a horizontal fashion on a solid concrete base.

B. TCE was pumped directly from tank trucks by pipe into the storage tank.

C. There are no records of any such leaks or spills.

D. No.

Response to Request No. 17. See attached list, which comprises management and supervisory employees who may have had some involvement with waste disposal.

Response to Request No. 18. See attached.

Response to Request No. 19. See attached, along with regular reports provided to the Indiana Stream Pollution Control Board and EPA.

Response to Request No. 8. A solvent recovery still was operated from 1970 until 1980. The still was a Phillips Model Number RS75-S, which operated by means of a simple heating and condensation distillation process, permitting the reuse of distilled solvents.

Response to Request No. 9. As defined in the designated regulations, the by-product constituted still bottom materials, including grease and oily residues, metal filings and chips, and unreclaimed TCE.

Response to Request No. 10.

A. For all the years in which the still was operated, the non-reclaimed materials were placed in drums.

B. No records exist to provide a response to this request.

C. The drummed up material was stored on the premises until returned to the vendor.

D. The drums of nonreclaimed material were stored adjacent to the east side of the main manufacturing building on asphalted surface near the shipping dock.

E. None, other than use of drums and asphalt paving.

F. There are no records of any such spills or releases.

Response to Request No. 11. We are aware of one or more natural depression pits which existed in areas which were subsequently filled and upon which buildings were constructed in 1955, 1963 and 1966. There are no records of the nature or amounts of any hazardous wastes being disposed of in any such pits, although it is believed that broken glass was dumped into those areas.